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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

UNITED STATES OF AMERICA,

6:24-cv-01758-MO

Plaintiff,

v.

**COMPLAINT, *in rem*,
FOR FORFEITURE**

**\$134,800.00 U.S. CURRENCY,
\$20,304.00 U.S. CURRENCY, \$588.00
U.S. CURRENCY, 1934-A \$500 BILL,
FOREIGN CURRENCY GOLD
COINS, FOREIGN SILVER COINS,
GOLD BAR, SILVER BARS, SILVER
COINS, and SILVER SKULLS, *in rem*,**

Defendants.

Plaintiff, United States of America, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 18 U.S.C. § 981; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendants, *in rem*, \$134,800.00 U.S. Currency, \$20,304.00 U.S. Currency, \$588.00 U.S. Currency, 1934-A \$500 bill, foreign currency gold coins, foreign silver coins, gold bar, silver bars, silver coins, and silver skulls, were seized in the District of Oregon, and are now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendants, *in rem*, \$134,800.00 U.S. Currency, \$20,304.00 U.S. Currency, \$588.00 U.S. Currency, 1934-A \$500 bill, foreign currency gold coins, foreign silver coins, gold bar, silver bars, silver coins, and silver skulls, constitute, or are derived from, proceeds traceable to 18 U.S.C. § 1343 (Wire Fraud), and are forfeitable to the United States pursuant to the provisions of 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the declaration of Christopher Perham, Special Agent, IRS – Criminal Investigation Division, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendants, *in rem*, \$134,800.00 U.S. Currency, \$20,304.00 U.S. Currency, \$588.00 U.S. Currency, 1934-A \$500 bill, foreign currency gold coins, foreign silver coins, gold bar, silver bars, silver coins, and silver skulls; that due notice be given to all interested persons to appear and show cause why forfeiture of these defendants, *in rem*, should not be decreed; that due proceedings be had thereon; that these defendants be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements

incurred in this.

Respectfully submitted this 18th day of October 2024.

NATALIE K. WIGHT
United States Attorney

s/ Judith R. Harper
JUDITH R. HARPER
Assistant United States Attorney

VERIFICATION

I, Christopher Perham, declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the IRS – Criminal Investigation Division and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

s/ Christopher Perham
Christopher Perham
Special Agent
IRS – Criminal Investigation Division